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May 2, 1995

95-RF-03951

Kurt Muenchow
Environmental Restoration Division
DOE, RFFO

ADMIN RECORD

APRIL 20, 1995, UPDATE ON OPERABLE UNIT SIX (OU6) REMEDIAL INVESTIGATION (RI) AND FEASIBILITY STUDIES (FS) ISSUES CONDENSED MEETING MINUTES - NAH-012-95

Action: Forward meeting minutes to the Environmental Protection Agency (EPA) and Colorado Department of Public Health and Environment (CDPHE).

This letter transmits the proceedings from the Remedial Investigation (RI) and Feasibility Studies (FS) Issues meeting that was held on April 20, 1995. Please forward to the Environmental Protection Agency (EPA) and the Colorado Department of Public Health and Environment (CDPHE).

Please contact me at extension 6987, if you have any questions.

Neil A. Holsteen
Neil A. Holsteen
Operable Units No. 5 - 7 Closures
Environmental Restoration Program Division

NAH:cb

Orig. and 1 cc - K. Muenchow

Attachment:
As Stated

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UPDATE ON OU6 RI AND FS ISSUES
April 20, 1995

Attendees:

Harlan Ainscough - CDPHE	E. C. Mast - EG&G
R. M. Cygnarowicz - EG&G	Kurt Muenchow - DOE/OR
M. L. Hogg, ICF-Kaiser for EG&G	R. A. Randall - EG&G
N. A. Holsteen - EG&G	Rich Stegen - Parsons
Bonnie Lavelle - EPA	John Stover - DOE/PMO
P. J. Martin - EG&G	

The meeting began at 0900 hours with Pete Martin briefing on the B-1 Dam Hot Spot Removal.

1. B-1 Dam Hot Spot Removal

The Hot Spot was uncovered during B-1 dam renovation. The associated pipe and drum have already been removed. Based on the '93 fiddler survey, the radiological contamination was concentrated in a small area at the water level. It is assumed that the contamination extends anywhere from 2-4 feet below the surface.

This effort will probably cost \$150,000 with most of this taken up by analytical costs. The funding will be derived from the underspent condition of the OU6 Accelerated Actions Work Package. If this money is not spent this year, it will be lost.

EPA Biggest concern is how does this fit into the overall picture of OU6? What are our goals in OU6?

DOE Real reason that DOE is pushing these actions is to show progress. This is something that can be done reasonably quick in this Fiscal Year. Even though risk is not a major factor, this action aids in the goal of clean up of Rocky Flats.

CDPHE Are there any cost savings by doing this concurrent with OU6 remediation activities? Isn't it more cost effective to only mobilize once?

The Hot Spot clean up will be handled differently than sediment remediation. There will be two different crews and technologies carrying out separate activities.

CDPHE The lead for the PAM will be CDPHE will be Caren Joahannes who can be reached at 693-2300.

2. Presentation of PCB project analytical data in the RFI/RI Report

The pond sediments were sampled from 0-6", which is different than the Work Plan requirements of 0-2". We would like to use this information in Chapter 4, Nature and Extent, and the Human Health Risk Assessment (HHRA), however we want to keep it separate. After incorporation into the HHRA, we will find a way to discuss risk as a whole.

EPA We would like to see the overall risk, not a separation.

CDPHE Can we have a meeting when the PCB project data and associated risk is evaluated with the rest of the data?

3. What is the final decision on Arsenic?

The EPA approval letter for the COC TM directed us to retain arsenic as a human health COC in stream sediments. Based on a spatial distribution evaluation for Rocky Flats and also the Front Range, historical knowledge of arsenic use at the plant site, and the low values detected, it does not appear that arsenic should be considered a COC in stream sediments for OU6.

We do not want to consider arsenic as a HHRA COC. However, the risk to arsenic for the site and background will be evaluated separately in the Uncertainty Section of the HHRA.

EPA The EPA would like a comprehensive evaluation of risk, even though the arsenic project data might be analyzed separately. EPA will write a letter that approves the COC TM but does not require arsenic to be a stream sediment COC.

CDPHE concurred with this.

4. Results from the RAAMP Samplers

TM1 requires the use of RAAMP Sampler data in the air modeling for OU6. We are not using this data because we are modeling PM10 data from each area of concern. The RAAMP data are total particulate matter and the PM10 data are a subset of that.

EPA Make an attempt to find the PM10 Samplers on plant site and try to tie the data to the RAAMP data. Would like to have an air workshop.

5. Who will evaluate whether Toxicity data is necessary from a storm event stream sample.

CDPHE Talk to Jeb Love about this.

EPA Would like to have Lloyd Parrish look at this data. He is the EPA aquatic biologist.

6. Acetone and Methylene Chloride data that are now U-coded and were not U-coded at the time of the cut-off data for the OU6 Draft Report database.

A lot of data showed hits of acetone and methylene chloride. These were showing up as B-qualified data on the nature and extent maps. During the first data delivery from Quantalex, the lab qualifier was reported in a column that was not uploaded into RFEDS. Woodward-Clyde-Federal Services will be removing these data from Nature and Extent.

7. Early review of draft sections of the RFI/RI Report.

Chapters 1-5 are in good shape and will be available for review in the near future. The HHRA is almost complete and will undergo some minor revisions before it is available for review.

EPA Would like a less formal review similar to OU3. Would be able to come to Interlocken and spend the day reviewing the Draft Report. The risk assessment may require a more formal review.

8. TCE data for groundwater near the OU6 trenches.

In a previous OU6 meeting, it was agreed upon that the groundwater contamination around the OU6 trenches, south of the OU7 landfill would be addressed by OU7. However, it appears as though OU7 will not be assessing the contamination. The source of this contamination is still unclear.

Although this is not an OU6 assessment, we will ensure that it does not fall through the cracks.

An attempt will be made to install groundwater wells between the PU&D yard and this area for further information.

Note: Since the meeting on April 20, it has been learned that OU7 will model the VOC data from the trench area wells.

9. Vinyl Chloride hit upstream of IHSS 141, Sludge Dispersal Area.

This is probably linked to OU2; however, OU6 will continue to evaluate it and the impact on the South Walnut Creek drainage.

10. Discrepancies in the Background Comparison for OU6

This was discovered while studying the arsenic issue. Woodward-Clyde did not use SAS code for their background comparison, they wrote their own code. We had EG&G Statistical Applications do a background comparison on the OU6 database and several discrepancies were discovered. In summary, we have discovered a problem and are documenting it. There may not be any problem, we are still investigating the situation.

Feasibility Study Issues

1. Streamlining of the FS by replacing TM1 and TM2 with letters and follow-up presentations to the agencies.

TM1 is already nearly final and this would not save any time or money to change to a letter.

TM2 could experience cost and schedule savings by submitting a letter summarizing the alternative development and screening process. This would be accompanied by a presentation that would provide an explanation of the development of the screening of alternatives. We can expect approximately one month of savings by preparing a letter for TM2.

EPA EPA is in the process of writing a letter that documents their support for this approach and emphasizes support for attempts to be flexible and creative.

DOE Would like to see us be able to move forward when we have enough information to jell a vision for where we are going in this OU. This could be when the ecological risk assessment (ERA), HHRA, and detailed analysis of alternatives have each reached a stage where we can start focusing our efforts. We will still continue with the formal documentation process, but we want to accelerate the front end of the decision process. As we narrow the funnel, we want everybody to be on board, including stakeholders.

The Clean-Up Work Plan provides a model that we can use. The HHRA will be complete soon and the ERA screening process will be done by mid-May.

We will plan on meeting in late May to begin a dialogue on the decision process. We will discuss the results of TM1, the ERA screening results, and the HHRA.

2. Combining the OU5 and OU6 Feasibility Studies.

EPA and CDPHE did not have any problem with this as long as the OUs were covered. It is an internal administrative issue for DOE/EG&G to resolve.